

*United States Attorney
Southern District of New York*

September 4, 2020

Hon. Paul G. Gardephe
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Schulte v. BOP*, 20 Civ. 2795 (PGG)

Dear Judge Gardephe:

I write respectfully on behalf of the federal defendant (“the Government”) in response to the Court’s order dated June 29, 2019, directing the Government to provide to Plaintiff, who is appearing *pro se*, the identity of the individuals who were involved in an incident that allegedly occurred on March 8, 2020. I write respectfully to request an additional thirty days, *nunc pro tunc*, from August 28, 2020 to September 27, 2020 to comply with the Court’s order. The Government seeks this additional time because the Bureau of Prisons’ counsel has been extremely busy due to COVID-19 related issues. This is the Government’s first request for an extension to time. Because Plaintiff is incarcerated, I was unable to obtain his consent before making this request.

We thank the Court for its consideration of this request and apologize for the delay in making this request.

Respectfully submitted,

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